

## Global Marine Drilling Company

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July 19, 1999

Department of the Interior  
Minerals Management Service  
Mail Stop 4024  
381 Elden Street  
Herndon, Virginia 20170-4817

Attention: Training of Lessee and Contractor Employees Engaged in Oil and Gas and Sulphur Operations in the Outer Continental Shelf (OCS).

Dear Sir or Madam:

Global Marine Drilling Company (GMDC) appreciates this opportunity to submit comments on the Minerals Management Service (MMS) proposed rule on Training of Lessee and Contractor Employees Engaged in Oil and Gas and Sulphur Operations in the Outer Continental Shelf (OCS).

We commend the MMS's stated objectives of developing a "performance-based training system" and providing "increased training flexibility". However we have concerns pertaining to the "performance-based program".

In an effort to move to a "performance-based program" MMS has proposed to discontinue the existing training program certification process. While the existing system has been criticized as too prescriptive, the proposed regulations do not contain requirements regarding course duration, class size, periodic retraining and other factors. The absence of these training requirements we feel is not in the best interest of the industry. Some in our industry may take this as a sign to extend training frequency from two years to six years, or reduce well control certification to a one time simple course and test.

GMDC currently requires drillers on its rigs to hold, at a minimum, a valid MMS Well Control Certificate. Should the MMS discontinue the existing program, GMDC will adopt the International Association of Drilling Contractor's (IADC) Well Control Accreditation Program (WellCAP), as its standard. WellCAP does have requirements regarding course duration, class size and periodic retraining.

Global Marine does not have an in-house well control school. We rely on outside contractors (Randy Smith Drilling Schools, Well Control Schools (WCS), etc.) to provide well control training. With WellCAP as our standard, we will be assured a standard of training between contractors.

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Likewise, GMDC feels the drilling industry requires an acceptable level of quality in the area of well control training. We would encourage you to reference the IADC's WellCAP programs, WCT-2W and WCT-2D as an industry benchmark in your final rule.

The requirement, proposed in 30 CFR 250.1512(c), that the lessee must pay for all costs associated with hands-on simulator tests, without limitation, is unreasonable and certainly lacking in due process. Further, the payment of MMS's costs associated with such testing would seem to circumvent the appropriations process.

We are opposed to the proposed schedule for the implementation of this rule making. We feel that 90 days following codification of the rule, is not enough time to develop training programs as now required by the rule. 180 - 270 days is a more appropriate amount of time.

#### **ANSWERS TO SPECIFIC QUESTIONS POSTED BY MMS**

**1. Is there a specific written test score (re: threshold level) we should use to signify the competency of an individual?**

RESPONSE: We do not believe that a written test alone signifies competency. Seventy percent (70%) is generally determined to be an acceptable score on an examination, but without reviewing the questions, it is impossible to say that scoring 70% on a written test establishes an understanding of the subject matter.

We suggest that MMS:

- a. Validate the test by giving it to a representative group of wellcontrol workers on the OCS. Mean average of the scores should represent a passing score, or
- b. Let an industry group of industry experts (API, IADC, etc.) review the test or assist in the construction of test to ensure questions are relevant.

**2. If an individual or group of individuals receives a written test score below a level determined to signify competency, should we issue an INC, conduct a retest, or initiate some other type of enforcement action?**

RESPONSE: We do not believe the MMS should issue an INC or initiate enforcement action based on a written test.

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Should an individual or group of individuals receive a test score below a determined level, the MMS should notify the contractor, lessee or lessee's representative and they collectively should:

1. Interview the individual(s). If they collectively determine the individual(s) are incompetent, the individual(s) should be replaced with a person or group of persons deemed to be competent.
2. If the individual(s) do not pass the interview as outlined above, the individual(s) should take a retest within 30 days, or reenter the company's well control training program within 45 days.

**3. What issues should we focus on when conducting employee interviews? How often should these interviews be conducted? What situation(s) should trigger MMS to conduct an interview?**

RESPONSE: The following questions are representative of those that might be asked during interviews on an offshore drilling rig working on the OCS. They were taken from 30 CFR 250.1510(b)(2):

1. Can the employee address management about training needs?
2. Do employees have training tied to their job function in: drilling well control, workover/well completion well control and well servicing well control?

Questions should be of a general nature and relative to the employee's job. There is a question in 30 CFR 250.1510(b)(2) about the Paperwork Reduction Act. This would be a topic that is not relative to a position on an offshore drilling rig, and should not be asked in an employee interview.

A general interview may be conducted anytime the MMS is aboard the rig, AS LONG AS THE INTERVIEW DOES NOT INTERFERE WITH THE EMPLOYEE'S WORK.

We do not have a problem with the MMS's current methods of conducting casual interviews or engaging employees in casual conversation while aboard rigs operating on the OCS.

**4. What type of enforcement action should we initiate if during an employee interview an employee exhibits only a minimal understanding of the employer's training program?**

RESPONSE: Should the MMS interview one individual and find he/she does not understand the company's training program, the MMS should then interview other individuals or a group of individuals. Following this interview(s), should the MMS determine that employees have only

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a minimal understanding of the company's training program, the MMS should conduct an audit of the company's training records as described in the April 20, 1999 Federal Register/ Proposed Rules 250.1510(a)(1).

There should be no enforcement action based on employee interviews.

**5. Are there any situations where we should not allow an employee to continue working on the OCS?**

RESPONSE: With respect to training, there are no situations where the MMS should discontinue an employee's employment. The MMS may suggest that an employer, lessee or lessee's representative move a supervisor from a position of responsibility to a position of lesser responsibility.

**6. Under what circumstances should we initiate hands-on testing of employees?**

RESPONSE: We are opposed to 'Hands On Testing' as defined in the Proposed Rule. The definition defines hands on testing as testing with a simulator or live well. While simulators are an excellent means of teaching a principle, the actual operation of well control simulators available on the market today can vary greatly. An employee might be very skilled at the operation of one type of simulator and understand all the principles taught on that simulator, while they might have no skill in the operation of a different simulator.

Testing on a live well, where the employee is not familiar with blowout preventer configuration, manifold configuration or pump operation is not only dangerous, but as confusing as putting the employee him on a simulator with which he is unfamiliar.

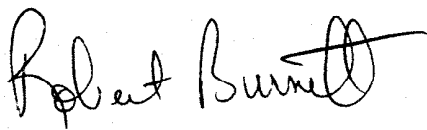
We are not opposed to observation of simulator testing at a well control school. We are also not opposed to the MMS evaluating personnel in their familiarity with existing equipment on rig. Examples of this would be; asking the employee to explain how the choke manifold is set up, or how well control equipment works.

We are not opposed to the MMS observing or participating in Pit Drills or Inside Blowout Prevention Drills aboard the rig.

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Thank you again for the opportunity to offer comments. If you have any questions on our comments, please contact me.

Sincerely yours,

A handwritten signature in black ink that reads "Robert Burnett". The signature is written in a cursive style with a large, stylized "R" and a long horizontal stroke at the end.

Robert Burnett  
Training Manager  
Global Marine Drilling Company